



COUNTY OF LOS ANGELES
OFFICE OF THE COUNTY COUNSEL

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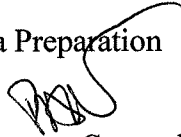
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December 22, 2014

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TO: PATRICK OGAWA
Acting Executive Officer
Board of Supervisors

Attention: Agenda Preparation

FROM: PATRICK A. WU 
Senior Assistant County Counsel
Executive Office

RE: **Item for the Board of Supervisors' Agenda**
County Claims Board Recommendation
Kali Louise Hais v. County of Los Angeles
Los Angeles Superior Court Case No. BC 491 835

Attached is the Agenda entry for the Los Angeles County Claims Board's recommendation regarding the above-referenced matter. Also attached is the Case Summary and Summary Corrective Action Plan to be made available to the public.

It is requested that this recommendation, the Case Summary, and Summary Corrective Action Plan be placed on the Board of Supervisors' agenda.

PAW:cs

Attachments

Board Agenda

MISCELLANEOUS COMMUNICATIONS

Los Angeles County Claims Board's recommendation: Authorize settlement of the matter entitled Kali Louise Hais v. County of Los Angeles, Los Angeles Superior Court Case No. BC 491 835, in the amount of \$799,950, plus waiver of the County's medical bills in the estimated amount of \$214,500, and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Department of Health Services' budget.

This lawsuit concerns allegations of negligent medical care by staff at LAC+USC Medical Center, which contributed to Plaintiff's injuries.

CASE SUMMARY

INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Kali Louise Hais v. County of Los Angeles
CASE NUMBER	BC 491835
COURT	Los Angeles Superior Court - Central
DATE FILED	September 10, 2012
COUNTY DEPARTMENT	Department of Health Services
PROPOSED SETTLEMENT AMOUNT	\$799,950, plus waiver of the County's medical bills in the estimated amount of \$214,500
ATTORNEY FOR PLAINTIFF	Peter J. McNulty, Esq. McNulty Law Firm
COUNTY COUNSEL ATTORNEY	Narbeh Bagdasarian - Senior Deputy County Counsel
NATURE OF CASE	<p>After suffering a fall, Kali Louise Hais, was taken to LAC+USC Medical Center, a County facility. While hospitalized at that facility, the plaintiff fell from her bed and suffered additional injuries.</p> <p>In her lawsuit against the County of Los Angeles, the plaintiff claims that the care provided to her at LAC+USC Medical Center was negligent thereby contributing to her fall and the resulting injuries.</p>
PAID ATTORNEY FEES, TO DATE	\$92,166
PAID COSTS, TO DATE	\$78,511

Case Name: Hais, Kailli #3947



Summary Corrective Action Plan

The intent of this form is to assist departments in writing a corrective action plan summary for attachment to the settlement documents developed for the Board of Supervisors and/or the County of Los Angeles Claims Board. The summary should be a specific overview of the claims/lawsuits' identified root causes and corrective actions (status, time frame, and responsible party). This summary does not replace the Corrective Action Plan form. If there is a question related to confidentiality, please consult County Counsel.

Date of incident/event:	June 22, 2012
Briefly provide a description of the incident/event:	<p>After suffering a fall, Kailli Louise Hais, was taken to LAC+USC Medical Center, a County facility. While hospitalized at that facility, the plaintiff fell from her bed and suffered additional injuries.</p> <p>In her lawsuit against the County of Los Angeles, the plaintiff claims that the care provided to her at LAC+USC Medical Center was negligent thereby contributing to her fall and the resulting injuries.</p>

1. Briefly describe the root cause(s) of the claim/lawsuit:

Brain injury resulting from a fall.

2. Briefly describe recommended corrective actions:
(Include each corrective action, due date, responsible party, and any disciplinary actions if appropriate)

- All appropriate personnel corrective actions have been implemented.
- Staff was educated regarding falls prevention measures, restraint application, and hourly rounding.
- All DHS facilities were evaluated with regard to their monitoring procedures for patients in restraints.
- All DHS facilities monitor patients in restraints every 15 minutes.
- DHS created a system-wide Falls Risk Assessment and Prevention Policy.

3. Are the corrective actions addressing department-wide system issues?

- ☒ Yes – The corrective actions address department-wide system issues.
- ☐ No – The corrective actions are only applicable to the affected parties.

County of Los Angeles
Summary Corrective Action Plan

Name: (Risk Management Coordinator)	
Signature: <i>ATM</i>	Date: 10/15/14

Name: (Department Head) Mitchell H Katz M.D.	
Signature: <i>Mitchell H Katz</i>	Date: 11/13/14

Chief Executive Office Risk Management Inspector General USE ONLY	
Are the corrective actions applicable to other departments within the County?	
<input type="checkbox"/> Yes, the corrective actions potentially have County-wide applicability.	
<input checked="" type="checkbox"/> No, the corrective actions are applicable only to this department.	
Name: (Risk Management Inspector General)	
Signature: <i>Destiny Castro</i>	Date: 11/7/2014